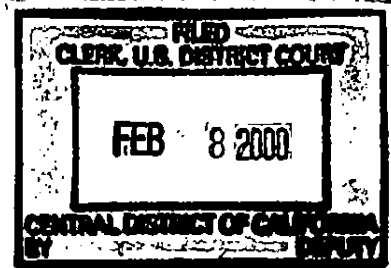


EDWARD J. CASEY (State Bar No. 119571)  
WESTON, BENSHOOF, ROCHEFORT,  
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444 South Flower Street, Forty Third Floor  
Los Angeles, California 90071-2901  
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Attorneys for Plaintiff and Counterdefendant  
PANOS SKLAVENTITIS



UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA

PANO SKLAVENTITIS, an individual,  
Plaintiff,

v.

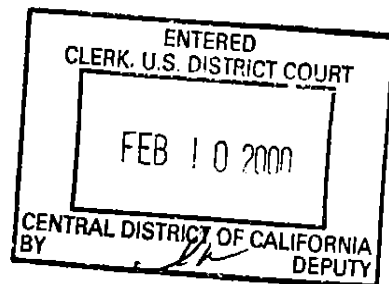
ELI COHEN, an individual; JUDITH  
TOTH, an individual; JAMES WATSON,  
an individual; DANA MACKAY, an  
individual; MARK KALE, an individual;  
AMERICAN REAL ESTATE HOLDINGS,  
a partnership; RALPHS GROCERY  
COMPANY, a Delaware corporation; and  
FEDERATED DEPARTMENT STORES,  
INC., a Delaware corporation,

Defendants.

AND RELATED COUNTERCLAIMS  
AND CROSS-CLAIMS

Case No. 95-8542 CBM(JGx)

JOINT STIPULATION FOR  
DISMISSAL OF COMPLAINT,  
COUNTER-CLAIMS AND CROSS-  
CLAIMS [AND PROPOSED ORDER  
THEREON]



The parties hereto, by and through their respective counsel of record, stipulate to  
agree as follows:

1. That the First Amended Complaint filed by the plaintiff herein against all  
defendants on or about March 28, 1996 shall be dismissed with prejudice in its entirety;

2. That the Counter-claims and Cross-claims filed herein by defendant

American Real Estate Holdings on or about February 9, 1996 shall be dismissed with prejudice

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WESTON BENSHOOF ROCHEFORT RUBALCAVA MACCUISH LLP  
444 South Flower Street, Forty Third Floor  
Los Angeles, California 90071-2901  
(213) 623-2322

as to the parties to this Stipulation and without prejudice as to all others;

3. That the Counter-claims and Cross-claims filed herein by defendants James Watson, Dana Mackay, and Mark Kale on or about February 16, 1996 shall be dismissed with prejudice as to the parties to this Stipulation and without prejudice as to all others;

4. That the Counter-claims and Cross-claims filed herein by defendants Eli Cohen and Judith Toth on or about March 4, 1996 shall be dismissed with prejudice as to the parties to this Stipulation and without prejudice as to all others;

5. That the Counter-claims and Cross-claims filed herein by defendant Federated Department Stores, Inc. on or about February 13, 1996 and October 1, 1997 shall be dismissed with prejudice as to the parties to this Stipulation and without prejudice as to all others;

6. That the Third Party Claims filed herein by defendant Federated Department Stores, Inc. on or about October 1, 1997 shall be dismissed with prejudice as to Calsol, Inc. and without prejudice as to all others; and

7. That each party is to bear its own expenses, costs, and attorneys' fees with respect to this litigation.

8. This Stipulation may be signed in counterpart by counsel.

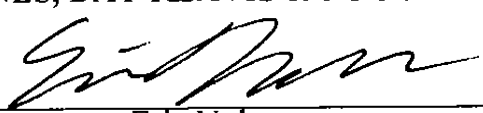
DATED: January 31, 2000

**WESTON, BENSHOOF, ROCHEFORT,  
RUBALCAVA & MacCUIISH LLP**

  
Edward J. Casey  
Attorneys for Plaintiff PANOS SKLAVENITIS

DATED: January 27, 2000

**JONES, DAY REAVIS & POGUE**

  
Erin Nolan  
Attorneys for Defendant FEDERATED DEPARTMENT  
STORES, INC.

1 DATED: January 21, 2000


2 FRANDZEL, SHARE, ROBINS,  
3 KAPLAN & BLOOM

4 

5 Grant K. Riley  
6 Attorneys for Defendants JAMES WATSON, DANA  
7 MacKAY and MARK D. KALE

8 DATED: January \_\_, 2000

9 YAMAMOTO & YAMAMOTO, LLP

10   
11 Andrew Yamamoto

12 Attorneys for Defendant AMERICAN REAL  
13 ESTATE HOLDINGS

14 DATED: January \_\_, 2000

15 LAW OFFICES OF MIKE HICKOK

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17 Mike Hickok

18 Attorneys for Defendant RALPHS GROCERY  
19 COMPANY

20 DATED: January \_\_, 2000

21 HAIGHT, BROWN & BONESTEEL, LLP

22   
23 Farah Nicol

24 Attorneys for Defendants ELI COHEN and JUDITH  
25 TOTH


1 DATED: January \_\_, 2000

FRANDZEL, SHARE, ROBINS,  
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5 Grant K. Riley  
Attorneys for Defendants JAMES WATSON, DANA  
MacKAY and MARK D. KALE

7 DATED: January 21, 2000

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for Andrew Yamamoto  
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ESTATE HOLDINGS

12 DATED: January \_\_, 2000

LAW OFFICES OF MIKE HICKOK

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17 DATED: January \_\_, 2000

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1 DATED: January \_\_, 2000

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7 DATED: January \_\_, 2000

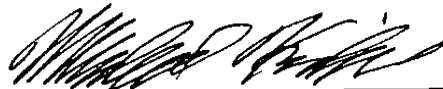
YAMAMOTO & YAMAMOTO, LLP

Andrew Yamamoto

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ESTATE HOLDINGS

12 DATED: January 26, 2000

LAW OFFICES OF MIKE HICKOK



Mike Hickok

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17 DATED: January \_\_, 2000

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TOTH

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(213) 623-2322

1 DATED: January \_\_, 2000

FRANDZEL, SHARE, ROBINS,  
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5 Grant K. Riley

Attorneys for Defendants JAMES WATSON, DANA  
MacKAY and MARK D. KALE

7 DATED: January \_\_, 2000

YAMAMOTO & YAMAMOTO, LLP

9  
10 Andrew Yamamoto

Attorneys for Defendant AMERICAN REAL  
ESTATE HOLDINGS

12 DATED: January \_\_, 2000

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Attorneys for Defendant RALPHS GROCERY  
COMPANY

17 DATED: January 26, 2000

HAIGHT, BROWN & BONESTEEL, LLP

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Farah Nicol

Attorneys for Defendants ELI COHEN and JUDITH  
TOTH

1 DATED: January 26, 2000

LaFOLLETTE, JOHNSON, DeHASS,  
FESLER & AMES

2  
3  
4   
Elizabeth Fladley  
Attorneys for Third-Party Defendant CALSOL

5  
6  
7 **ORDER**

8 IT IS SO ORDERED.

9  
10  
11 Dated: FEB 8 2000, 2000

  
United States District Court Judge

WESTON BENSHOOF ROCHEFORT RUBALCAVA MACCUISH LLP  
444 South Flower Street, Forty Third Floor  
Los Angeles, California 90071-2901  
(213) 623-2322

**PROOF OF SERVICE**

I, LAURA CENICEROS, declare:

I am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action. My business address is Weston, Benshoof, Rochefort, Rubalcava & MacCuish, 444 South Flower Street, Forty-Third Floor, Los Angeles, CA 90071-2901. I am over the age of eighteen years and not a party to the action in which this service is made.

On February 7, 2000, I served the document(s) described as **JOINT STIPULATION FOR DISMISSAL OF COMPLAINT, COUNTER-CLAIMS AND CROSS-CLAIMS [AND PROPOSED ORDER THEREON]** in the interested parties in this action by enclosing the document(s) in a sealed envelope addressed as follows:

**[SEE ATTACHED SERVICE LIST]**

☒ BY MAIL: I am "readily familiar" with this firm's practice for the collection and the processing of correspondence for mailing with the United States Postal Service. In the ordinary course of business, the correspondence would be deposited with the United States Postal Service at 444 South Flower Street, Los Angeles, California 90071-2901 with postage thereon fully prepaid the same day on which the correspondence was placed for collection and mailing at the firm. Following ordinary business practices, I placed for collection and mailing with the United States Postal Service such envelope at McClintock, Weston, Benshoof, Rochefort, Rubalcava & MacCuish LLP, 444 South Flower Street, Los Angeles, California 90071-2901.

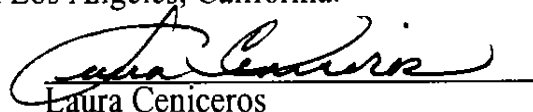
☐ BY FEDERAL EXPRESS ☐ UPS NEXT DAY AIR ☐ OVERNIGHT DELIVERY: I deposited such envelope in a facility regularly maintained by ☐ FEDERAL EXPRESS ☐ UPS ☐ Overnight Delivery [specify name of service: ] with delivery fees fully provided for or delivered the envelope to a courier or driver of ☐ FEDERAL EXPRESS ☐ UPS ☐ OVERNIGHT DELIVERY [specify name of service:] authorized to receive documents at McClintock, Weston, Benshoof, Rochefort, Rubalcava & MacCuish LLP, 444 South Flower Street, Los Angeles, California 90071-2901 with delivery fees fully provided for.

☐ BY FACSIMILE: I telecopied a copy of said document(s) to the following addressee(s) at the following number(s) in accordance with the written confirmation of counsel in this action.

☐ [State] I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

☒ [Federal] I declare under penalty of perjury that the foregoing is true and correct.

Executed on February 7, 2000, at Los Angeles, California.

  
Laura Cenicerros

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Los Angeles, California 90071-2901  
(213) 623-2322

Sklavenitis v. Cohen, et al.  
United States District Court - Central  
Case No. 95-8542 CBM (JGx)

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**CALSOL**